

TINNEMANS *et al.* – 10/813,687  
Attorney Docket No. 081468-0308853

- Amendment -

### REMARKS

Reconsideration and the timely allowance of the pending claims, in view of the following remarks, are respectfully requested.

In the Office Action dated February 15, 2006, the Examiner rejected claims 1-10 and 15-17, under 35 U.S.C. §102(e), as allegedly being anticipated by Hofer '772 (U.S. Patent No. 6,828,772); rejected claims 1-10, 15-18, and 21, under 35 U.S.C. §102(b), as allegedly being anticipated by Segers '483 (U.S. Patent No. 6,404,483); and rejected claims 1-5, 8-10, and 15-21, under 35 U.S.C. §103(a), as allegedly being unpatentable over Aoki '928 (U.S. Patent No. 6,559,928) in view of Akiyama '577 (U.S. Patent No. 4,788,577).

The Examiner also objected to claim 1 as allegedly containing an informality.

By this Amendment, Applicants have amended claim 1 to overcome the informality indicated by the Examiner. Applicants submit that no new matter has been introduced. As such, claims 1-10, 15-18, and 21 continue to be presented for examination, of which claims 1, 15, 18, and 21 are independent. Applicants respectfully request the immediate withdrawal of the objection to claim 1.

Applicants respectfully traverse the prior art rejections, under 35 U.S.C. §102(b),(e) and §103(a) for the following reasons.

#### 1. Prior Art Rejections

As noted above, independent claim 1, as originally filed, positively recites that the compliant structure configured to compensate for at least one of a tilt and displacement between said object and said clamp. These features are amply supported by the embodiments disclosed in the Specification. (*See, e.g.,* Originally-filed Specification: par. [0074] – [0075], [0080]; FIGs. 3a, 3b, 4b, 4c).

Unlike the present invention, none of the asserted references teach or suggest each and every element of claim 1, including the features identified above. In

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particular, the Examiner rejected claim 1, under 35 U.S.C. §102(e), as allegedly being anticipated by Hofer '772. Applicants respectfully disagree.

The Hofer '772 reference teaches that the wafer holding structure 10 contains three wedge assemblies 50, 55 in order to *securely hold the semiconductor wafer 40 in place*. Each of the wedge assemblies 50, 55 contains a V-shaped slot with a rubber material, such as Tygon, to secure the semiconductor wafer 40 within the V-shaped slot. (See, Hofer '772: col. 4, lines 46-55).

In so doing, there is nothing in Hofer '772 that teaches that the wedge assemblies 50, 55 are configured to compensate for at least one of a tilt and displacement between said object and said clamp, as required by claim 1. Rather, their function is to securely hold the object. Accordingly, the Hofer '772 reference cannot anticipate claim 1.

The Examiner rejected claim 1, under 35 U.S.C. §102(b), as allegedly being anticipated by Segers '483. Applicants respectfully disagree.

The Segers '483 reference teaches that a pick-up hand 133 is provided on the end of arm 131 and has two fingers 134 which are inserted underneath wafer W to pick-up the wafer W. The pick-up hand 133 carries coupling half 135a, which mates with a corresponding coupling half 135b on the pre-aligner 2. The coupling 135a, 135b is used to ensure that the pick-up hand 133 is accurately positioned relative to the pre-aligner 2 when the wafer W is picked up. (See, Segers '483: col. 7, lines 6-18; FIG. 5a-5c).

Again, there is nothing in Segers '483 that teaches that the coupling 135a, 135b is configured to compensate for at least one of a tilt and displacement between said object and said clamp, as required by claim 1. Rather, the coupling 135a, 135b functions to ensure that pick-up hand 133 is aligned with pre-aligner 2. Accordingly, the Segers '483 reference cannot anticipate claim 1.

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The Examiner rejected claim 1, under 35 U.S.C. §103(a), as allegedly being unpatentable over Aoki '928 in view of Akiyama '577. Applicants respectfully disagree.

As acknowledged by the Examiner, Aoki '928 fails to teach the claimed compliant structure and the Examiner relied on Akiyama '577 as allegedly teaching this feature. Akiyama '577 teaches the use of a flexible chuck 10 with a base plate 14 and columns 15 provided on the stage 3 that support the base plate 14. Disposed through the base plate 14 are column screws 16, each corresponding to each triangular block 12, for supporting the flexible chuck 10, and spring-loaded bars 17 for pulling or biasing downwardly the flexible chuck 10. Each of the column screws 16 meshes with an internal thread formed in the base plate 14 and is rotated by a motor 19 via a flexible coupling 18 to effect a vertical movement, thereby displacing the point 13 vertically. (See, Akiyama '577: col. 4, lines 25-33; FIG. 6).

In contrast to the Examiner's assertions, there is absolutely nothing in Akiyama '577 that teaches or suggests that coupling 18 is configured to compensate for at least one of a tilt and displacement between said object and said clamp, as required by claim 1.

For at least these reasons, Applicants submit that the none of the asserted references teach or suggest the claimed combination of elements recited by amended claim 1. Accordingly, Applicants submit that claim 1 is patentable and request the immediate withdrawal of the prior art rejections of claim 1. In addition, because claims 2-10 depend from claim 1, claims 2-10 are also patentable by virtue of dependency as well as for their additional recitations.

Furthermore, because independent claims 15, 18, and 21 recite similar patentable features as noted above with respect to claim 1, claims 15, 18, and 21 are also patentable for at least the reasons submitted relative to claim 1. And, because claims 16-17 depend from claim 15, claims 16-17 are also patentable by virtue of dependency as well as for their additional recitations.

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## II. Conclusion.

All matters having been addressed and in view of the foregoing, Applicants respectfully request the entry of this Amendment, the Examiner's reconsideration of this application, and the immediate allowance of all pending claims.

Applicants' Counsel remains ready to assist the Examiner in any way to facilitate and expedite the prosecution of this matter. If any point remains in issue which the Examiner feels may be best resolved through a personal or telephone interview, please contact the Undersigned at the telephone number listed below.

Please charge any fees associated with the submission of this paper to Deposit Account Number **033975**, under Order No. 081468-0308853.

The Commissioner for Patents is also authorized to credit any over payments to the above-referenced Deposit Account.

Respectfully submitted,

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